

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

In re Boy Scouts of America and Delaware BSA
LLC, Debtors

Chapter 11
Bankruptcy Case No. 20-10343-LSS
(Jointly Administered)

National Union Fire Insurance Co. of Pittsburgh, PA, et al., appellants v.
Boy Scouts of America and Delaware BSA, LLC et al, appellees.

**LUJAN CLAIMANTS' EMERGENCY MOTION
FOR AN EXTENSION OF TIME TO FILE THEIR REPLY BRIEF**

1. Certain tort claimants represented by Lujan Wolff, LLP (the "Lujan Claimants") are appellants herein. Their reply brief in this appeal is due per the orders of this court, including standing orders, at 5:00 p.m. Eastern Standard Time today, on December 21, 2022.
2. Unfortunately, as of this afternoon, Lujan Claimants' counsel is experiencing some unanticipated computer issues. Hence, Lujan Claimants require a very short extension of time to file their reply brief. Lujan Claimants hope to be able to file their reply brief before midnight, hopefully well before that.
3. While Lujan Claimants regret the timing of this motion, they are not filing this motion for purposes of delay or for any other improper purpose and have every intention of filing their reply as soon as the computer issues are resolved.
4. Lujan Claimants appreciate that non-dispositive motions of this nature must be filed only after a request has been made to all other parties to consent to the relief requested. Due to the fact that these computer issues only just arose, Lujan Claimants are requesting consent more or less contemporaneously with the filing of this Motion.

Dated: December 21, 2022

Respectfully Submitted,

/s Christopher D. Loizides
Christopher D. Loizides (No. 3968)

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